

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA**

OKLAHOMA STATE DEPARTMENT OF
EDUCATION, and
RYAN WALTERS, in his official capacity
as Superintendent of Public Instruction,
and in his individual capacity,

Plaintiffs,

v.

FREEDOM FROM RELIGION
FOUNDATION,

Defendant.

Case No. 6:25-cv-94-JFH

Hon. John F. Heil, III

**DEFENDANT’S UNOPPOSED MOTION TO EXTEND THE DEADLINE TO FILE
REPLY BRIEF IN FURTHER SUPPORT OF DEFENDANT’S MOTION TO DISMISS**

Defendant respectfully requests, pursuant to LCvR 7.1(e), that the Court extend the deadline to file Defendant’s reply brief in further support of its Motion to Dismiss Plaintiffs’ Complaint by seven (7) days. Doc. 17. In support of this request, Defendant states as follows:

1. On May 9, 2025, Defendant filed its Motion to Dismiss Plaintiffs’ Complaint. Doc. 17.
2. On May 23, 2025, Plaintiffs filed their response to the Defendant’s Motion to Dismiss. Doc. 24.
3. Under LCvR 7.1(e), Defendant’s deadline to file a reply brief in further support of its Motion to Dismiss was set to June 6, 2025 by default.
4. Defendant respectfully request that this Court extend the deadline to submit a reply brief in further support of its Motion to Dismiss by seven (7) days to June 13, 2025.
5. Defendant has not made any other requests to extend a filing deadline in this matter.

6. Counsel for Defendant have conferred with counsel for Plaintiffs prior to filing this motion. Plaintiffs do not object to an extension of seven days.
7. One member of the Defendant's legal team, Adam Hines, will be out of office from May 23, 2025 to June 1, 2025. Another member, Megan Lambert, has a conflicting briefing deadline in *Padres Unidos de Tulsa, et al. v. Drummond, et al.*, No. 24-cv-511 (W.D. Okla.)
8. Other members of Defendant's legal team, Vera Eidelman and Scarlet Kim, have a conflicting briefing deadline in *Rhode Island Latino Arts v NEA*, No. 1:25-cv-79-WES (D.R.I.).
9. Granting this motion will not affect any other deadlines.

WHEREFORE, Defendant respectfully requests that the Court extend the time to file its reply in further support of Defendant's Motion to Dismiss until June 13, 2025.

Date: May 27, 2025

Respectfully submitted,

/s/ Megan Lambert

Megan Lambert
Oklahoma Bar Number: 33216
Adam H. Hines
Oklahoma Bar Number: 35640
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION OF OKLAHOMA
P.O. Box 13327
Oklahoma City, OK 73113
Tel.: 405-524-8511
ahines@acluok.org
mlambert@acluok.org

Vera Eidelman*
Scarlet Kim*
Ben Wizner*
AMERICAN CIVIL LIBERTIES
UNION FOUNDATION
125 Broad Street, 18th Floor

New York, NY 10004
Tel: 212-549-2500
veidelman@aclu.org
scarletk@aclu.org
bwizner@aclu.org

Counsel for Defendant

**Admitted pro hac vice*

CERTIFICATE OF SERVICE

I hereby certify that on May 27, 2025, I electronically filed the foregoing document with the Clerk of Court via the Court's CM/ECF system, which effects service upon all counsel of record.

Respectfully submitted,

/s/ Megan Lambert

Megan Lambert

AMERICAN CIVIL LIBERTIES UNION

FOUNDATION OF OKLAHOMA

P.O. Box 13327

Oklahoma City, OK 73113

Tel.: 405-524-8511

mlambert@acluok.org

Counsel for Defendant